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13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 In re:
17 PG&E CORPORATION,
18 - and -
19 PACIFIC GAS AND ELECTRIC
20 COMPANY,
21 Debtors.

22 Affects PG&E Corporation
23 Affects Pacific Gas and Electric Company
24 Affects both Debtors

25 * *All papers shall be filed in the Lead Case,*
26 *No. 19-30088 (DM)*

Case No. 19-30088 (DM) (Lead Case)
(Jointly Administered)

Chapter 11

**THE AMERITRUST CLAIMANTS'
JOINDER AND STATEMENT IN
OPPOSITION TO REORGANIZED
DEBTORS' THIRTEENTH SECURITIES
CLAIMS OMNIBUS OBJECTION
(CLAIMS BARRED BY THE STATUTE
OF REPOSE)**

Hearing Information:

Date: September 29, 2021
Time: 10:00 a.m. (Pacific Time)
Place: (Telephone Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 Individual Claimants Phyllis S. Prange Trust, Ramon L. Prange IRA, Ramon L. Prange
2 IRA and Susan Singer (“**AmeriTrust Claimants**”) hereby file this joinder and statement (the
3 “**Joinder**”) in opposition to Reorganized Debtors’ Thirteenth Securities Claims Omnibus
4 Objection (Claims Barred By the Statute of Repose) (the “**Thirteenth Objection**”) [Docket No.
5 11085]. The Thirteenth Objection makes the same arguments and is based on the same incorrect
6 premise as the Reorganized Debtors’ Eleventh Securities Claims Omnibus Objection (Claims
7 Barred By the Statute of Repose) (the “**Eleventh Objection**”) [Docket No. 11014]. The
8 AmeriTrust Claimants therefore file this Joinder in support of the PGIM FI Claimants’ Response
9 and Opposition to Reorganized Debtors’ Eleventh Securities Claims Omnibus Objection (the
10 “**PGIM Response and Opposition**”) [Docket No. 11168] and Oregon’s Opposition to
11 Reorganized Debtors’ Eleventh Securities Claims Omnibus Objection (Claims Barred By the
12 Statute of Repose) (the “**Oregon Opposition**”) [Docket No. 11170] as their opposition to the
13 Thirteenth Objection.

14 **JOINDER**

15 The AmeriTrust Claimants hereby join the PGIM Response and Opposition and the Oregon
16 Opposition. The AmeriTrust Claimants support, adopt and incorporate by reference the arguments
17 made therein.¹ The AmeriTrist Claimants respectfully submit that the arguments against granting
18 the Eleventh Omnibus Objection apply with equal force and weight in favor of denying the
19 Thirteenth Omnibus Objection. Further, because the Thirteenth Omnibus Objection adds no new
20 arguments to the Eleventh Omnibus Objection, it serves judicial efficiency and avoids a waste of
21 resources by the parties for the AmeriTrust Claimants to file this simple joinder.

22 **JOINDER IS APPROPRIATE AND SERVES JUDICIAL EFFICIENCY**

23 The AmeriTrust Claimants incorporation of arguments made in response to the Eleventh
24 Omnibus Objection serves judicial efficiency. The Thirteenth Omnibus Objection is a near carbon
25 copy of the Eleventh Omnibus Objection. Debtors acknowledge as much in their objection. *See*
26 Thirteenth Omnibus Objection at 1 n. 1 (“[Debtors] have requested relief with respect to identically
27 situated claims in [the Eleventh Omnibus Objection]. . .”). Further, a software generated

¹ In conformance with the ADR Procedures adopted by this Court, the AmeriTrust Claimants provide Appendix A, listing information relevant to their claims, including claim numbers.

1 comparison of the two objections shows them to be effectively identical. *See* Exhibit 1 (providing
2 a redline of the Thirteenth Omnibus Objection to the Eleventh Omnibus Objection). Where, as
3 here, a party makes the exact same arguments via two separate motions or sets of papers, the
4 AmeriTrust Claimants respectfully submit it serves overall efficiency to incorporate and apply
5 responses to one motion or set of arguments to the other without burdening the Court with
6 additional, unnecessary, paper.

7 **RESERVATION OF RIGHTS**

8 The AmeriTrust Claimants reserve all of their respective rights, claims, defenses, and
9 remedies, including, without limitation, the right to amend, modify, or supplement this Joinder in
10 accordance with applicable rules.

11
12 Dated: September 15, 2021

ROLNICK KRAMER SADIGHI LLP

13
14 By: 

15 RICHARD A. BODNAR

16 *Attorneys for the AmeriTrust Claimants*

APPENDIX A

CREDITOR	CLAIM NO.	DATE	AMOUNT OF CLAIM	NOTICE ADDRESS
Phyllis S Prange Trust	107040	3/30/2021	Unliquidated	Richard A. Bodnar Rolnick Kramer Sadighi LLP 1251 Avenue of the Americas New York, New York 10020 212.597.2800 rbodnar@rksllp.com
Ramon L Prange IRA	107038	3/30/2021	Unliquidated	Richard A. Bodnar Rolnick Kramer Sadighi LLP 1251 Avenue of the Americas New York, New York 10020 212.597.2800 rbodnar@rksllp.com
Ramon L Prange IRA	107039	3/31/2021	Unliquidated	Richard A. Bodnar Rolnick Kramer Sadighi LLP 1251 Avenue of the Americas New York, New York 10020 212.597.2800 rbodnar@rksllp.com
Susan Singer	104331	5/11/2020	Unliquidated	Richard A. Bodnar Rolnick Kramer Sadighi LLP 1251 Avenue of the Americas New York, New York 10020 212.597.2800 rbodnar@rksllp.com